

APPENDIX B

Federal Decisions Concluding that Colombia is an Available and Adequate Forum

Circuit Court Decisions

Paolicelli v. Ford Motor Co., 289 F. App'x 387, 391 (11th Cir. 2008) (per curiam) (affirming district court's conclusion that Colombia was an available and adequate forum and rejecting arguments that Colombia was not available due to political instability and safety risks)

Iragorri v. Int'l Elevator, Inc., 203 F.3d 8, 13–14 (1st Cir. 2000) (affirming district court's conclusion that Colombia was an available and adequate forum and rejecting arguments that Colombia was not available due to risk of traveling there)

District Court Decisions

Serje v. Rappi, Inc., 2021 WL 2633536, at *1–2 (N.D. Cal. June 25, 2021) (“Colombia is an adequate alternative forum.”), *appeal dismissed*, 2021 WL 4911978 (9th Cir. Oct. 6, 2021)

Termorio S.A. E.S.P. v. Electrificadora Del Atlantico S.A. E.S.P., 421 F. Supp. 2d 87, 103 (D.D.C. 2006) (“[P]laintiffs have presented no persuasive reason why Columbian courts are inadequate.”), *aff'd sub nom. TermoRio S.A. E.S.P. v. Electranta S.P.*, 487 F.3d 928 (D.C. Cir. 2007)

Ocean Shelf Trading Inc. v. Flota Mercante Grancolombiana S.A., 638 F. Supp. 249, 251 (S.D.N.Y. 1986) (“As the courts of Colombia would clearly have jurisdiction over Colombian defendants, Colombia provides an adequate alternative forum.”)

Atencio S v. the Ciudad De Bogota, 155 F. Supp. 590, 591–92 (S.D.N.Y. 1957) (“There is no suggestion that libellant will have any difficulty of access to Colombian courts to enforce his rights, nor even that this court would be more convenient for him.”)